ING Bank Śląski S.A. Group

Qualitative and quantitative disclosures

relating to capital adequacy

for the 1st quarter of 2025

Contents

Introduction

Pursuant to the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 as amended (Regulation CRR) and the Banking Law Act of 29 August 1997 as amended (Banking Law Act), ING Bank Śląski S.A., hereinafter referred to as the Bank, is obliged to make qualitative and quantitative disclosures relating to the capital adequacy, excluding information immaterial, proprietary or confidential.

Pursuant to the "Policy of disclosing qualitative and quantitative information on capital adequacy and variable components of remuneration of ING Bank Śląski S.A.", disclosures relating to the ING Bank Śląski S.A. Group, hereinafter referred to as the Group, are published.

Disclosures in this document are based on the data from the quarterly consolidated report of the ING Bank Śląski S.A. Group for the 1st quarter of 2025. The presented values have been prepared in Polish zlotys (PLN). Unless provided for otherwise, all values were given rounded up to PLN million. Therefore, there may be cases of mathematical inconsistency in the summaries or between individual tables.

For the disclosure of information, templates of forms included in the Commission Implementing Regulation (EU) 2024/3172 were used, hence the letter markings of the table columns and the numbering of lines.

1. Regulatory capital requirements calculation

The Group is required to maintain T1 and TCR ratios at least at the level of 9.51% and 11.51% respectively.

The requirement arises from the provisions of Regulation CRR, i.e.:

- for Common Equity Tier 1 ratio - CET1 – 4.5%,
- for Tier 1 ratio - T1 - 6.0%, and,
- for Total capital ratio (TCR) - 8.0%,

and the capital buffers determined in accordance with the Act on macroprudential supervision over the financial system and crisis management in the financial system of 05 August 2015 in the total amount of 3.51%.

The capital requirement for credit risk represents approx. 87% of the Group's overall capital requirement and has the greatest impact on capital adequacy calculation.

Quantitative information on the risk-weighted exposure amount and capital requirements for individual risk types in accordance with the requirements of Article 438 of the Regulation CRR, according to the following templates contained in Commission Implementing Regulation (EU) 2024/3172, is presented below:

- Template EU OV1 – Overview of total risk exposure amounts,
- Template EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level,
- Template EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level,
- Template EU CVA4 – RWEA flow statements of credit valuation adjustment risk under the Standardised Approach (SA),
- Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach.

29 April 2025 the Ordinary General Meeting of the Bank approved the distribution of the profit for 2024. The data as at 31 December 2024 were recalculated taking into account the net profit generated in 2024 in own funds.

Template EU OV1 – Overview of total risk exposure amounts

		a	b	c
		Total risk exposure amounts (TREA)		Total own funds requirements
		31 Mar 2025	31 Dec 2024	31 Mar 2025
1	**Credit risk (excluding CCR)**	**102,952**	**104,431**	**8,236**
2	Of which the standardised approach	44,625	49,128	3,570
3	Of which the Foundation IRB (F-IRB) approach	16,877	0	1,350
4	Of which slotting approach	0	0	0
EU-4a	Of which equities under the simple risk weighted approach	646	1,098	52
5	Of which the Advanced IRB (A-IRB) approach	40,587	54,011	3,247
6	**Counterparty credit risk - CCR**	**417**	**788**	**34**
7	Of which the standardised approach	357	587	29
8	Of which internal model method (IMM)	0	0	0
EU-8a	Of which exposures to a CCP	60	59	5
9	Of which other CCR	0	142	0
10	**Credit valuation adjustments risk - CVA risk**	**302**	**17**	**24**
EU 10a	Of which the standardised approach (SA)	302	17	24
EU 10b	Of which the basic approach (F-BA and R-BA)	0	0	0
EU 10c	Of which the simplified approach	0	0	0
15	**Settlement risk**	**0**	**0**	**0**
16	**Securitisation exposures in the non-trading book (after the cap)**	**367**	**376**	**29**
17	Of which SEC-IRBA approach	0	0	0
18	Of which SEC-ERBA (including IAA)	0	0	0
19	Of which SEC-SA approach	367	376	29
EU-19a	Of which 1250%	0	0	0
20	**Position, foreign exchange and commodities risks (Market risk)**	**1,346**	**1,223**	**108**
21	Of which the Alternative standardised approach (A-SA)	1,346	1,223	108
EU 21a	Of which the Simplified standardised approach (S-SA)	0	0	0
22	Of which Alternative Internal Model Approach (A-IMA)	0	0	0
EU-22a	**Large exposures**	**0**	**0**	**0**
23	**Reclassifications between the trading and non-trading books**	**0**	**0**	**0**
24	**Operational risk**	**14,456**	**18,276**	**1,157**
EU 24a	**Exposures to crypto-assets**	**0**	**0**	**0**
25	**Amounts below the thresholds for deduction (subject to 250% risk weight)**	**1,548**	**1,921**	**124**
26	**Output floor applied (%)**	**50.00%**	**n/a**	
27	**Floor adjustment (before application of transitional cap)**	**0**	**n/a**	
28	**Floor adjustment (after application of transitional cap)**	**0**	**n/a**	
29	**Total**	**119,840**	**125,111**	**9,588**

* table rows (11-14) that do not apply to the Group have been omitted.

Template EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level

		a	b	c	d	EU d
		RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Credit risk (excluding counterparty credit risk)	57,464	45,488	102,952	116,079	107,816
2	Counterparty credit risk	362	55	417	769	622
3	Credit valuation adjustment		302	302	302	302
4	Securitisation exposures in the banking book	0	367	367	367	367
5	Market risk	0	1,346	1,346	354	354
6	Operational risk		14,456	14,456	14,456	14,456
7	Other risk weighted exposure amounts		0	0	0	0
8	**Total**	**57,826**	**62,014**	**119,840**	**132,327**	**123,917**

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Template EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level

		a	b	c	d	EU d
		Risk weighted exposure amounts (RWEAs)				
		RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Central governments and central banks	0	0	2,030	2,030	2,030
EU 1a	Regional governments or local authorities	0	0	523	523	523
EU 1b	Public sector entities	0	0	0	0	0
EU 1c	Categorised as Multilateral Development Banks in SA	0	0	0	0	0
EU 1d	Categorised as International organisations in SA	0	0	0	0	0
2	Institutions	4,183	7,647	4,184	7,648	6,116
3	Equity	0	0	862	862	862
4	Not applicable					
5	Corporates	40,904	58,910	45,900	63,909	57,178
5.1	Of which: F-IRB is applied	12,694	23,885	12,694	23,888	20,366
5.2	Of which: A-IRB is applied	28,210	35,025	28,210	35,025	31,816
EU 5a	Of which: Corporates - General	36,341	50,457	41,337	55,456	50,022
EU 5b	Of which: Corporates - Specialised lending	4,563	8,453	4,563	8,453	7,156
EU 5c	Of which: Corporates - Purchased receivables	0	0	0	0	0
6	Retail	0	0	11,776	11,776	11,776
6.1	Of which: Retail - Qualifying revolving	0	0	0	0	0
EU 6.1a	Of which: Retail - Purchased receivables	0	0	0	0	0
EU 6.1b	Of which: Retail - Other	0	0	11,776	11,776	11,776
6.2	Of which: Retail - Secured by residential real estate	0	0	0	0	0
7	Not applicable					
EU-7a	Categorised as secured by immovable properties and ADC exposures in SA	0	0	22,559	22,559	22,559
EU 7b	Collective investment undertakings (CIU)	0	0	0	0	0
EU-7c	Categorised as exposures in default in SA	0	0	915	915	915
EU 7d	Categorised as subordinated debt exposures in SA	0	0	0	0	0
EU 7e	Categorised as covered bonds in SA	0	0	0	0	0
EU 7f	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	0	0	0	0	0
8	Other non-credit obligation assets	12,377	0	14,203	5,857	5,857
9	**Total**	**57,464**	**66,557**	**102,952**	**116,079**	**107,816**

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Template EU CVA4 – RWEA flow statements of credit valuation adjustment risk under the Standardised Approach (SA)

		a
		Risk weighted exposure amount
1	Risk weighted exposure amount as at the end of the previous reporting period	17
2	Risk weighted exposure amount as at the end of the current reporting period	302

Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach

		a
		Risk weighted exposure amount
1	**Risk weighted exposure amount as at the end of the previous reporting period**	**55,303**
2	Asset size (+/-)	1,487
3	Asset quality (+/-)	1,548
4	Model updates (+/-)	217
5	Methodology and policy (+/-)	-5,713
6	Acquisitions and disposals (+/-)	0
7	Foreign exchange movements (+/-)	-268
8	Other (+/-)	3,190
9	**Risk weighted exposure amount as at the end of the reporting period**	**55,764**

The amount of risk-weighted exposures resulting from the use of internal models increased by PLN 461 million in the first quarter of 2025 compared to the fourth quarter of 2024. This increase is the result of an increase in risk-weighted assets resulting from credit acquisition (+1,487 million), changes in the quality of the credit portfolio (+1,548 million), model updates (+217 million) and other changes (+3,190 million), partially offset by changes in methodologies and policies (-5,713 million) and changes in exchange rates (-268 million). The increase in risk-weighted assets resulting from credit acquisition is a consequence of the sale of loans. The change in the quality of the credit portfolio results from the recognition of collateral and the assessment of the creditworthiness of customers. The update of the models results from the revision of the existing capital charges on the models used. Other changes result from the management buffers that the Group has adopted to address uncertainties resulting from the implementation of the Regulation CRR3, as well as changes resulting from the reclassification of SME customers. The decrease in risk-weighted assets due to changes in methodology and policy results from the change in the scope of application of the advanced approach in the Regulation CRR3, including the application of supervisory parameters for part of the portfolio under the FIRB approach, the inclusion of a substitution approach as a result of which part of the risk exposure received parameters from the standardized approach and the application of minimum supervisory values of model parameters (input floors). The decrease in risk-weighted assets due to changes in exchange rates results from exposures in foreign currencies that are subject to revaluation in connection with changes in exchange rates between the reporting dates.

2. Information on liquidity

ING Bank Śląski S.A. Group recognises the process of stable management of liquidity and funding risk as a major process at the Group.
Liquidity and funding risk is understood by the Group as the risk of the lack of ability to perform financial liabilities under on- and off-balance sheet items at reasonable prices. The Group maintains liquidity so that the Group's financial liabilities can always be repaid with the available funds, inflows from maturing transactions, available funding sources at market prices and/or liquidation of negotiable assets.

Liquidity Coverage Ratio (LCR) information

In compliance with the duties and principles set out in Regulation CRR and of the Council and Commission Delegated Regulation's (EU) No 2015/61, 2018/1620 and 2022/1994, the Group calculates the following regulatory liquidity measures - short-term liquidity measures (LCR – Liquidity Coverage Ratio) – this is to ensure that the Group holds an adequate level of high quality liquid assets to cover its liquidity needs within 30 calendar days under stressed conditions. In the first quarter of 2025 a regulatory limit of 100% applied. The Group is obliged to report the liquidity measures to the regulator on a monthly basis. As at 31 March 2025 Liquidity Covered Ratio for the Group was 241%.

In compliance with the Guidelines on the disclosure of the net outflow coverage ratio, in addition to the disclosure of information on liquidity risk management issued by EBA, the Group is obliged to disclose components of the LCR in the form as specified in the table EU LIQ1 (net outflow coverage ratio – total). It contains the following information:

- high quality liquid assets – a "weighted" amount subject to value reduction,
- cash outflows – weighted and unweighted outflows,
- cash inflows – weighted and unweighted inflows.

Such weighted inflows and outflows are calculated as values after application of inflow and outflow ratios. The numbers cover the values for each of the four calendar quarters preceding the report date. Those are average observed values at the end of each month in the 12-month period preceding the end of each quarter.

The information covers all positions irrespective of the denomination currency and are presented in PLN. The net outflow coverage ratio contains all important elements for the Group's liquidity profile.

Apart from the values of the net outflow coverage ratio calculated for all currencies, the Group also monitors ratios calculated for major currencies – PLN and EUR.

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The LCR ratio as at 31 March 2025 decreased by 38 percentage points compared to 31 December 2024. This is mainly the effect of lower inflows, partially offset by the growth of liquid assets. The decrease in inflows (-5,266 million) was mainly driven by reverse repos secured by securities not included in HQLA (-5,724 million) and other inflows (-959 million). The increase in liquid assets (+5,261 million) was mainly due to an increase in the volume of exposures to the central bank - an increase in NBP bills (+8,990 million), which was partially offset by a decrease in the volume of unencumbered government bonds (-2,961 million).

LCR

	31 Mar 2025		31 Dec 2024		31 Mar 2025 vs 31 Dec 2024	
	241%		279%		-38 p.p.	
	Value	Weighted value	Value	Weighted value	Value	Weighted value
Liquid assets	61,559	61,559	56,298	56,298	5,261	5,261
Outflows	287,107	41,085	279,974	41,002	7,133	84
Inflows	22,646	15,571	25,834	20,837	-3,188	-5,266

The LCR ratio as at 31 March 2025 increased by 47 percentage points relative to 31 March 2024, which is mainly the result of lower outflows and higher inflows, partially offset by lower liquid assets. The decrease in outflows (-4,898 million) was mainly due to a decrease in other outflows (-5,257 million), which was offset partly by an increase in outflows from deposits (+1,269 million). The increase in inflows (+1 714 million) was mainly driven by an increase in other inflows (+1,254 million). The lower level of liquid assets (-633 million) was mainly due to a decrease in the volume of unencumbered government bonds (-2,812 million), which was partially offset by an increase in bonds issued by the EU (+1,994 million).

LCR

	31 Mar 2025		31 Mar 2024		31 Mar 2025 vs 31 Mar 2024	
	241%		194%		+47 p.p.	
	Value	Weighted value	Value	Value	Weighted value	Value
Liquid assets	61,559	61,559	62,192	62,192	-633	-633
Outflows	287,107	41,085	276,948	45,983	10,159	-4,898
Inflows	22,646	15,571	17,316	13,857	5,330	1,714

Explanations on the actual concentration of funding sources

Minimum once a year, the Group determines the overall business strategy and the resulting medium-term (3 years) financial plan with a general risk strategy. Financial plan is an indispensable element of the strategy which provides for an effective diversification of funding sources and tenors.

Asset and Liability Committee (ALCO) actively manages the funding base. Additionally, it monitors funding sources in order to:

- verify compliance with the strategy and financial plan,
- identify potential risks related to funding.

Customers' deposits (retail and corporate) are the core funding source for ING Bank Śląski S.A. Group. The Group monitors the funding structure and thus verifies concentration risk by analysing its deposit base split into:

- type of financing,
- customer segment,
- product type,
- currencies,
- geographical region, and
- concentration of large deposits.

Periodical analyses also monitor the risk generated by related customers (within Groups).

In accordance with the Commission Implementing Regulation (EU) 2022/1994, the Bank reports a set of additional monitoring indicators for the purposes of reporting on liquidity. The reports include, inter alia, reports on the concentration of funding sources:

- concentration of financing by counterparty,
- concentration of funding by product type.

As at 31 March 2025, in accordance with the principles set out in the Commission Implementing Regulation (EU) 2022/1994, the following were reported:

- concentration of financing by counterparty, includes information on the funds of the two largest clients. Here, the Group includes the non-concessional senior loan (NPS) received. The funds raised exceed the threshold of 1% of total liabilities,
- concentration of financing by product type, confirms that the main source of financing at the Group there are customer deposits. The most important are current and savings accounts of retail clients. Unsecured wholesale financing is only 29% of the financing indicated in reporting in accordance with the EU Commission Regulation. The information includes the total amount of funding received for each product category.

The existing funding structure is well diversified. The funding structure as at 31 March 2025 split into direct and mutual funding is presented below. Direct funding is provided mainly by retail and corporate customers while mutual funding comprised primarily funds acquired from other banks.

Direct funding

	value	% share
Retail customers	145,790	56.9%
Corporate customers	75,672	29.6%
Equity	23,260	9.1%
Own issues (including NPS)	10,792	4.2%
Banks	552	0.2%

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Mutual funding	value	% share
Banks	20,106	74.7%
Corporate customers	6,824	25.3%

High-level description of the composition of the institution`s liquidity buffer

Maintenance of an adequate liquidity buffer is a major element in managing the Group's liquidity. The liquidity buffer presents the available liquidity, required to cover the gap between cumulated outflows and inflows within a relatively short time. It covers assets that are "unencumbered" and easily available to acquire liquidity. Unencumbered assets are understood as assets that are free of any legal, regulatory, contractual restrictions to have them disposed of by the Group. The liquidity buffer is crucial in the times of a crisis when the Group has to obtain liquidity in a short time when the standard funding sources are unavailable or insufficient.

The liquidity buffer is maintained as a safeguard against materialisation of various extraordinary scenarios, providing for needs of additional liquidity which may arise at any time in extraordinary circumstances and in normal conditions.

The table below presents the structure of the liquid asset buffer as at 31 March 2025.

Structure of the liquidity buffer	value	% share
Treasury bonds or bonds issued by the central bank (PLN)	47,306	72.5%
Treasury bonds or bonds issued by the central bank (EUR)	7,107	10.9%
bonds of BGK , PFR and EIB	10,850	16.6%

The Group provides for realistic reductions due to impairment of securities with the level thereof being regularly reviewed and approved by ALCO. The reductions are assessed inter alia on the basis of market liquidity and depth, volatility of market prices, requirements of the central bank.

The Group also observes asset concentrations ensuring their safe diversification in terms of issuer, maturity and currency.

Level 1 liquid assets cover assets characterised with very high liquidity and credit quality. Here below there is a breakdown of level 1 liquid assets used by the Group to calculate the LCR ratio (as defined in the Commission Delegated Regulation (EU) No 2015/61) as at 31 March 2025.

Level 1 liquid assets	
Cash	762
Cash in nostro accounts with the Central Bank net of the required reserve	88
Other exposures to the Central Bank (O/N deposit, cash bills)	8,990
Unencumbered Treasury bonds	40,201
Assets constituting exposures to public sector entities	1,994
Unencumbered BGK bonds	1,775
Unencumbered bonds of the European Investment Bank	7,749
Total	**61,559**

In level 1 liquid assets, securities are presented by their market value. The Group's liquidity position is reduced by encumbered securities (constituting collateral, blocked) and increased by securities received as collateral in reverse-repo or buy-sell-back transactions.

Derivative exposures and potential collateral calls

Financial Institutions (FI) with which the Group concludes derivative transactions have signed collateral agreements (VMCSA - Variation Margin Credit Support Annex) which are an annex to the ISDA agreement. Some counterparties outside the FI may have regular CSA contracts, but as a rule they are not required to have them. In this case, the decision regarding the CSA is each time an element of the credit decision.

They regulate the issues of securing the portfolio of derivative transactions. They give the right to demand a security deposit to the party whose portfolio valuation for a given day is positive (the party's portfolio is in-the-money) and the right to demand the release of the collateral in the event of a change in this valuation.

As part of the collateral strategy for each CSA counterparty, a portfolio of transactions is valued daily against the maturity of the collateral.

Currency mismatch in the LCR

The Group runs an active liquidity management policy with regard to the main currencies in which the Group settles most of the number (value) of transactions. From the point of view of liquidity management, the Group considers the main (significant) currencies PLN, EUR, USD and CHF.

The table below presents detailed quantitative information on liquidity required by Article 451a of Regulation CRR and in accordance with template EU LIQ1 shown in the Commission Implementing Regulation (UE) 2024/3172.

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Template EU LIQ1 - Quantitative information of LCR

		Total unweighted value (average)				Total weighted value (average)			
EU 1a		31 Mar 2025	31 Dec 2024	30 Sep 2024	30 Jun 2024	31 Mar 2025	31 Dec 2024	30 Sep 2024	30 Jun 2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					**55,916**	**55,958**	**55,754**	**56,285**
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	158,943	155,934	152,541	149,448	10,772	10,627	10,453	10,286
3	Stable deposits	117,212	113,944	110,479	107,478	5,861	5,697	5,524	5,374
4	Less stable deposits	41,731	41,990	42,062	41,970	4,911	4,930	4,929	4,912
5	Unsecured wholesale funding	52,561	52,615	52,834	52,053	19,643	19,512	19,488	19,191
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	20,362	20,716	20,848	20,605	5,083	5,172	5,206	5,146
7	Non-operational deposits (all counterparties)	32,199	31,899	31,976	31,438	14,560	14,340	14,272	14,035
8	Unsecured debt	0	0	10	10	0	0	10	10
9	Secured wholesale funding					0	0	0	0
10	Additional requirements	24,521	24,819	24,923	24,617	3,510	3,697	3,830	3,897
11	Outflows related to derivative exposures and other collateral requirements	907	1,091	1,271	1,475	907	1,091	1,271	1,475
12	Outflows related to loss of funding on debt products	36	35	35	2	36	35	35	2
13	Credit and liquidity facilities	23,578	23,693	23,617	23,140	2,567	2,571	2,524	2,420
14	Other contractual funding obligations	7,018	8,474	9,267	10,013	6,455	7,916	8,718	9,475
15	Other contingent funding obligations	31,995	31,325	31,156	30,791	1,698	1,654	1,234	814
16	**TOTAL CASH OUTFLOWS**					**42,078**	**43,406**	**43,723**	**43,663**
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	11,586	11,106	11,207	10,900	9,706	9,711	9,173	6,879
18	Inflows from fully performing exposures	6,912	7,000	7,137	7,160	4,049	4,082	4,173	4,118
19	Other cash inflows	2,425	2,376	2,268	2,296	2,425	2,376	2,268	2,296
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies))					0	0	0	0
EU-19b	(Excess inflows from a related specialised credit institution))					0	0	0	0
20	**TOTAL CASH INFLOWS**	**20,923**	**20,482**	**20,612**	**20,356**	**16,180**	**16,169**	**15,614**	**13,293**
EU-20a	Fully exempt inflows	0	0	0	0	0	0	0	0
EU-20b	Inflows subject to 90% cap	0	0	0	0	0	0	0	0
EU-20c	Inflows subject to 75% cap	20,923	20,482	20,612	20,356	16,180	16,169	15,614	13,293
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					55,916	55,958	55,754	56,285
22	TOTAL NET CASH OUTFLOWS					25,898	27,237	28,109	30,370
23	LIQUIDITY COVERAGE RATIO					2.19	2.09	2.00	1.88

3. Impact of transitional provisions on capital adequacy

In the calculation of capital ratios, the Group applied the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in accordance with Article 468 of the Regulation CRR. As at 31 March 2025 the total capital ratio and Tier 1 ratio would be 15.95% and 14.92%, respectively, if the Group did not use this provision. In addition, until the end of 2024, in the calculation of capital ratios, the Group used transitional provisions to mitigate the impact of the implementation of IFRS 9 on the level of own funds.

IFRS 9/Article 468-FL: Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the application of the temporary treatment in accordance with Article 468 of the CRR

		31 Mar 2025	31 Dec 2024	30 Sep 2024	30 Jun 2024
Available capital (amounts)					
1	CET1 capital	18,098	18,237	16,794	16,837
2	CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18,098	18,220	16,759	16,802
2a	CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied *	17,855	18,005	16,590	16,837
3	Tier 1 capital	18,098	18,237	16,794	16,837
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18,098	18,220	16,759	16,802
4a	Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied *	17,855	18,005	16,590	16,837
5	Total capital	19,338	19,601	18,212	18,289
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19,338	19,584	18,177	18,254
6a	Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied *	19,095	19,370	18,008	18,289
Risk-weighted assets (amounts)					
7	Total risk-weighted assets	119,840	125,111	121,580	118,602
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	119,698	125,085	121,570	118,592
Capital ratios					
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	15.10%	14.58%	13.81%	14.20%
10	CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.10%	14.57%	13.79%	14.17%
10a	CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied *	14.92%	14.41%	13.66%	14.20%
11	Tier 1 (as a percentage of risk exposure amount)	15.10%	14.58%	13.81%	14.20%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.10%	14.57%	13.79%	14.17%
12a	Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied *	14.92%	14.41%	13.66%	14.20%
13	Total capital (as a percentage of risk exposure amount)	16.14%	15.67%	14.98%	15.42%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16.14%	15.66%	14.95%	15.39%
14a	Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied *	15.95%	15.50%	14.83%	15.42%
Leverage ratio					
15	Leverage ratio total exposure measure	293,445	276,497	270,968	264,626
16	Leverage ratio	6.17%	6.60%	6.20%	6.36%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6.17%	6.59%	6.18%	6.35%
17a	Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied *	6.09%	6.52%	6.12%	6.36%

* in the comparative period (as at 30 Jun 2024) the Group did not temporarily treat unrealized gains and losses measured at fair value through other comprehensive income, in line with Art. 468 of the Regulation CRR.

10 | ING Bank Śląski S.A. Group | Qualitative and quantitative disclosures relating to capital adequacy for the 1st quarter of 2025 | Data in PLN million

Statement

Based on Article 431 (3) of Regulation (EU) 575/2013 (Regulation CRR) Lead of Centre of Expertise Accounting Policy and Financial Reporting of ING Bank Śląski S.A. declares that:

- information contained in the disclosure document is adequate to the facts,
- information required by the provisions of part eight of the Regulation CRR was disclosed in accordance with the *"Policy of disclosing qualitative and quantitative information on capital adequacy and variable components of remuneration of ING Bank Śląski S.A."* and internal procedures, systems and controls described in the above-mentioned Policy and the *"Instruction of verification of the Policy of disclosing qualitative and quantitative information on capital adequacy and variable components of remuneration of ING Bank Śląski S.A."*, which has been included in annex to this Policy.

2025-05-07

Jolanta Alvarado Rodriguez
Lead of Centre of Expertise Accounting Policy and Financial Reporting

The original Polish document is signed with a qualified electronic signature